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7 *Attorneys for Defendant Allison Wong*

8 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

9 NBK INNOVATIONS XIII, LLC, DOJO  
VENTURES FUND II, LLC, SU FUND I, A  
10 SERIES OF INCISIVE VENTURES LP,  
ANTONIO SALERNO, SUSAN LEIBY,  
11 ALESSCO, INC. DEFINED BENEFIT  
PLAN, ROBERT HESS, AND MJ  
12 JAMIOLKOWSKI FLP,

13 Plaintiffs,

14 vs.

15 SUAVEI, INC., AFONSO INFANTE, AND  
ALLISON WONG,

16 Defendant.

Case No. 2:22-CV-01415

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT  
ALLISON WONG TO ANSWER OR  
OTHERWISE RESPOND TO  
COMPLAINT**

**(First Request)**

17 Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and District of Nevada Local  
18 Rule IA 6-1, Plaintiffs NBK Innovations XIII, LLC, DOJO Ventures Fund II, LLC, Su Fund I, A  
19 Series of Incisive Ventures LP, Antonio Salerno, Susan Leiby, Alessco, Inc. Defined Benefit Plan,  
20 Robert Hess, and MJ Jamiolkowski FLP, ("Plaintiffs") and Defendant Allison Wong  
21 ("Defendant" or "Wong"), through counsel, hereby agree and stipulate, as follows:

- 22 1. Plaintiffs filed their Complaint (the "Complaint") on August 30, 2022.
- 23 2. Plaintiffs served the Summons and Complaint on Defendant on September 6, 2022.
- 24 3. Pursuant to Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Defendant  
25 had 21 days from the date of service to file and serve an answer or other response to the Complaint  
26 (*i.e.*, until September 27, 2022).
- 27 4. Defendant and Plaintiffs stipulate to a 30-day extension of time to file and serve  
28

an answer or other respond to the Complaint, which makes the response due on October 27, 2022.

5. The reason for the extension is that Defendant's counsel has been investigating the circumstances surrounding the allegations since being retained and has also engaged in a telephonic conference with Plaintiffs' counsel in an effort to discuss and, if possible, resolve the dispute. The parties have agreed to have further discussions as well.

6. The parties timely filed a stipulation within the time required for the original response. Upon receipt of the order denying the stipulation, the parties prepared this revised stipulation and have submitted it as soon as time allowed. Thus, to the extent required, the failure to file a response to the complaint was the result of excusable neglect as the parties attempted to submit a timely stipulation to extend the deadline.

7. This is the first stipulation to extend the date for Defendant to answer or otherwise respond to the Complaint.

**IT IS SO AGREED AND STIPULATED:**

HOWARD & HOWARD ATTORNEYS PLLC HUTCHISON & STEFFEN, PLLC

By: /s/ L. Christopher Rose  
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*Attorneys for Defendant  
 Allison Wong*

By: /s/ Stewart C. Fitts  
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 Fund II, LLC, Su Fund I, A Series of  
 Incisive Ventures LP, Antonio Salerno,  
 Susan Leiby, Alessco, Inc. Defined Benefit  
 Plan, Robert Hess, and MJ Jamiolkowski  
 FLP*

**IT IS SO ORDERED:**



UNITED STATES MAGISTRATE JUDGE

DATED: October 4, 2022

## Amber M. Clayton

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**From:** Jonathan R. Martin  
**Sent:** Monday, October 3, 2022 10:46 AM  
**To:** Amber M. Clayton  
**Subject:** FW: Stip and Order to Extend



**Jonathan R. Martin**  
Attorney

3800 Howard Hughes Pkwy, STE 1000, Las Vegas, NV 89169  
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**From:** Stewart C. Fitts <[sfitts@hutchlegal.com](mailto:sfitts@hutchlegal.com)>  
**Sent:** Friday, September 30, 2022 5:02 PM  
**To:** Jonathan R. Martin <[jrmartin@howardandhoward.com](mailto:jrmartin@howardandhoward.com)>  
**Cc:** L. Christopher Rose <[lcr@h2law.com](mailto:lcr@h2law.com)>  
**Subject:** RE: Stip and Order to Extend

**CAUTION: EXTERNAL EMAIL**

Jonathan: Yes. This is fine and you may affix my e-signature.

---

**From:** Jonathan R. Martin <[jrmartin@howardandhoward.com](mailto:jrmartin@howardandhoward.com)>  
**Sent:** Friday, September 30, 2022 3:51 PM  
**To:** Stewart C. Fitts <[sfitts@hutchlegal.com](mailto:sfitts@hutchlegal.com)>  
**Cc:** L. Christopher Rose <[lcr@h2law.com](mailto:lcr@h2law.com)>  
**Subject:** Stip and Order to Extend

Good afternoon Mr. Fitts,

Our initial stipulation and order to extend time to answer was kicked back by the Court. We revised and need your permission, again, to affix your e-signature.

Please review and respond as soon as you have a moment.

Thank you,  
Jon Martin



Jonathan R. Martin  
Attorney

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Senior Counsel



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